

# BARTON

Maurice N. Ross  
Direct Dial: (212) 885-8845  
mross@bartonesq.com

ATTORNEYS AT LAW

September 11, 2018

**VIA ECF**

Honorable Peggy Kuo, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Graybar Building  
420 Lexington Avenue  
New York, NY 10170

(212) 687.6262 Office  
(212) 687.3667 Fax

[bartonesq.com](http://bartonesq.com)

**Re: *Dish Network L.L.C. v. Goyal Group Inc. et al.***  
**Case 1:18-cv-03857-ENV-PK**

Dear Judge Kuo:

We represent Defendants Goyal Group Inc. and Chandra Goyal in the above-referenced action. We respectfully submit this letter motion to request an adjournment of the Initial Conference currently scheduled before Your Honor for September 26, 2018 at 10:00 a.m., to October 3, 2018, October 4, 2018, October 5, 2018, or any day thereafter that is convenient for the Court and the parties. We make this request because I am conducting a long-scheduled mediation beginning on September 25 in Philadelphia, PA. Furthermore, my firm expects to soon represent Defendants ABC 1 NYC Inc. and Sonam Sangpo in this matter but have not yet been formally retained. This is the first request for an adjournment of this conference, and we have conferred with counsel for Plaintiff Dish Network L.L.C., who does not object to this request and is available on October 3, 4 and 5 if those days are convenient for the Court.

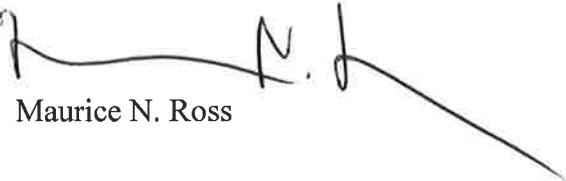
In addition, plaintiff has requested that one of its attorneys, Mr. Joseph H. Boyle, be permitted to participate in the conference by telephone. We understand that plaintiff's counsel, Stephen M. Ferguson, intends to attend the conference in person. Defendants have no objection to the participation of one or more of plaintiff's attorneys by telephone at the upcoming Initial Conference.

For these reasons, we respectfully request that the Initial Conference currently scheduled for September 26, 2018 at 10:00 a.m. be rescheduled to October 3, 4 or 5, 2018, and that the Court permit plaintiff's counsel to participate in the Initial Conference by telephone.

Honorable Peggy Kuo, U.S.M.J.  
September 11, 2018  
Page 2 of 2

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Maurice N. Ross". The signature is fluid and cursive, with a large, stylized "N" in the center.

Maurice N. Ross

cc: Counsel of Record  
*via ECF*